



REPUBLIC OF ESTONIA
MINISTRY OF CLIMATE

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Your ref 12.11.2024 No. 5-05/1266/2024

Our ref No 13.01.2025 6-3/24/5766-13

Answer to the notification regarding the environmental
impact assessment for the wind farm "Valmiera-Valka"

Dear Daiga Avdejanova,

On 13 October 2023, Latvia notified Estonia in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the "Valmiera-Valka" wind farm project. On 23 November 2023, Estonia sent a response letter to Latvia, expressing the intention to participate in the environmental impact assessment (hereinafter *EIA*) of the wind farm "Valmiera-Valka".

On 12 November 2024, Latvia informed Estonia of the EIA report of the "Valmiera-Valka" wind farm project and forwarded the EIA report in English and a summary of the EIA report in Estonian along with the notification.

The Ministry of Climate of Estonia organised a public display of the aforementioned document. The documents were shared with numerous authorities and non-governmental organisations. The notice of the public consultation procedure was published in the official publication *Ametlikud Teadaanded*. The public display took place from 9 December 2024 to 3 January 2025. Proposals were received from the Estonian Environmental Board (the statement is enclosed).

Summary of the comments and proposals by the Estonian Environmental Board (written by the Ministry of Climate of Estonia)

The Estonian Environmental Board noted that significant transboundary impact from the planned activity to Estonia is unlikely. However, due to deficiencies in the EIA report, it is currently not possible to give a final assessment on whether the evaluations in the report are sufficient and what impacts the project might have on Estonia. Therefore, the EIA report should be supplemented and resubmitted to Estonia for review.

The Estonian Environmental Board provided the following remarks about the EIA report:

1. The quality of the English and Estonian translations of the environmental report is insufficient. Consequently, it is difficult to understand which species were studied and analysed in this report (adding the species names in Latin would also be advisable). Additionally, the figures in the EIA report are in Latvian. It would be advisable to provide translations of the legend of the figures as additional information below the figures.

2. On page 141 of the EIA report, it is stated: “For a large part of this stretch, the Estonian side of the border also adjoins the Natura 2000 site Koiva-Mustjõe (EE0080471). This is a Natura 2000 Type A site, established for the protection of specially protected bird species. It lists 4 bird species - the kingfisher, the long-billed curlew, the corn bunting and the snipe.” The information on the conservation objectives of the Koiva-Mustjõe area hosting birds is incorrect:
 - The protections of the habitats of the corn bunting (*halltsiitsitaja*), long-billed curlew (*preeria-või idakoovitaja*) and snipe (*tikutaja*) is not a conservation objective of the Koiva-Mustjõe area hosting birds.
 - The northern pintail (*Anas acuta*), the European roller (*Coracias garrulus*), the corn crake (*Crex crex*) and the great snipe (*Gallinago media*) have been left out of the report.
3. On page 316 of the EIA report, it is claimed that the example of the “Saarde” wind farm demonstrates that wind farms and the lesser spotted eagle can coexist well. However, in Saarde, one lesser spotted eagle has died, and ongoing post-construction monitoring of the wind farm must determine whether the anticipated impacts have indeed been minimised.
4. The assessment of impacts on the western capercaillie (pages 317–319) relies on 7-year-old Swedish guidelines. However, more recent studies on this topic have been published, for example a study by Taubmann, Coppes and Andén (2021)¹.
5. Page 320 of the EIA report does not provide site-specific information related to the black stork (see the following note 6). Therefore, it is not possible to assess whether the evaluations given in the EIA report are sufficient.
6. Some figures in the EIA report are not published (“Figure contains limited access information”), and appendices (including appendix 6) have not been included in the report. Therefore, it is not possible to review the opinions from the biodiversity studies, which might have provided significant additional information (for example, on pages 143, 148 and 149). It is important that Latvia makes the appendices and figures of the EIA report available to Estonia (if necessary, for internal use).

Public meeting

A public meeting on the EIA of the “Valmiera-Valka” wind farm was held on 18 December 2024. On 20 December 2024, Latvia forwarded the protocol of the public meeting to Estonia.

Having reviewed the protocol of the meeting, we confirm that the Ministry of Climate of Estonia has no comments or proposals concerning the protocol.

Sincerely Yours,

(signed electronically)

Birgit Parmas
Point of Contact for the Espoo Convention

Enclosure: Statement of the Estonian Environmental Board

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¹ <https://www.naturvardsverket.se/publikationer/6900/capercaillie-and-wind-energy/>